



MCI Telecommunications
Corporation
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Washington, DC 20006
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 25, 1994

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

Re: RM 8480: Petition for Rulemaking of the Ad Hoc
Telecommunications Users Committee

Dear Mr. Caton:

Enclosed herewith for filing are the original and four (4) copies of MCI Telecommunications Corporation's Reply Comments in the above-captioned proceeding.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI Reply Comments furnished for such purpose and remit same to the bearer.

Sincerely yours,

Elizabeth Dickerson

Elizabeth Dickerson
Manager, Federal Regulatory

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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

In the Matter of)	
)	
Petition for Rulemaking of)	RM 8480
the Ad Hoc Telecommunications)	
Users Committee)	

REPLY COMMENTS

MCI Telecommunications Corporation ("MCI") hereby replies to comments filed July 8, 1994, in response to a petition for rulemaking submitted by the Ad Hoc Telecommunications Users Committee ("Ad Hoc") on April 15, 1994, in the above-captioned matter. In its petition, Ad Hoc proposed specific modifications to three areas of Commission's regulation of local exchange carriers ("LECs"): Universal Service Fund rules, Part 36 separations rules, and Part 69 access charge rules.

The remarks of other parties commenting in this proceeding bolster MCI's contention that it would be inappropriate to address universal service, separations, or access reform in any forum other than a Notice of Inquiry. Some parties agree with MCI that a comprehensive review is necessary.¹ Others suggest pursuing these matters through rulemakings based on

¹ Comments of AT&T, p. 2; and Comments of Sprint, p. 3.

individual parties' proposals² or merging consideration of these issues into ongoing dockets.³ MCI opposes these two approaches.

To merge consideration of access reform, for example, with the pending LEC Price Cap Review proceeding as BellSouth and USTA propose requires the Commission to issue a supplemental Notice of Proposed Rulemaking that raises Part 69 rate structure issues, and thereby adds a significant new set of issues to that proceeding. Issues such as the reform of access charges, universal service, and separations are simply too important to gloss over by incorporating them into a current docket, or even together in a single proceeding.

In addition, the Commission should consider diverse viewpoints on these issues before selecting an approach for reform. Numerous parties have submitted rulemaking petitions to date, but these do not represent the complete range of options for revision of the current Commission rules. By establishing Notices of Inquiry for each of these three major topics, the Commission can pursue investigations that are broad enough to ensure that it achieves the optimal resolutions that meet end users' needs while balancing the individual interests of the all concerned parties.

For the foregoing reasons, MCI urges the Commission to pursue separations and access charge reform, and review of universal service policy

² Comments of NYNEX, pp. 2-3.

³ Comments of BellSouth, p. 2; and Comments of USTA, p. 2.

through adoption of impartial Notices of Inquiry rather than through the rulemaking process or any docket that is not specifically dedicated to these matters.

Respectfully submitted,
MCI TELECOMMUNICATIONS CORPORATION

A handwritten signature in black ink that reads "Elizabeth Dickerson". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Elizabeth Dickerson
Manager, Federal Regulatory
1801 Pennsylvania Avenue, NW
Washington, DC 20006
(202) 887-3821

July 25, 1994

STATEMENT OF VERIFICATION

I have read the foregoing and, to the best of my knowledge, information, and belief, there is good ground to support it, and it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on July 25, 1994.

Elizabeth Dickerson

Elizabeth Dickerson
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CERTIFICATE OF SERVICE

I, Gwen Montalvo, do hereby certify that copies of the foregoing MCI's Comments were sent via first class mail, postage paid, to the following on this 25th day of July 1994:

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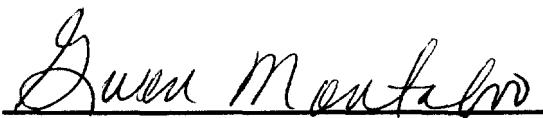
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